

Kevin H. Marino  
John D. Tortorella  
MARINO, TORTORELLA & BOYLE, P.C.  
437 Southern Boulevard  
Chatham, New Jersey 07928-1488  
Tel: (973) 824-9300  
Fax: (973) 824-8425  
*Counsel for Defendant Joseph Schwartz*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,  
vs.  
JOSEPH SCHWARTZ,  
Defendant.

**Case 2:22-cr-00013-001-SDW**

**Hon. Susan D. Wigenton, U.S.D.J.**

**NOTICE OF MOTION ON SHORT NOTICE  
FOR BAIL PENDING APPEAL  
OR TO EXTEND SURRENDER DATE**

**PLEASE TAKE NOTICE** that as soon as counsel may be heard, Defendant, Joseph Schwartz (“Schwartz”), through his attorneys, Marino, Tortorella & Boyle, P.C. (Kevin H. Marino, Esq., appearing) will move before the Honorable Susan D. Wigenton, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an order (i) granting Schwartz bail pending appeal; or (ii) in the alternative, extending his surrender date by ninety-one (91) days from the current surrender date of August 17, 2025, to November 16, 2025.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Schwartz will rely on the accompanying letter brief filed herewith. A proposed form of Order is also submitted herewith.

Dated: July 24, 2025

**MARINO, TORTORELLA & BOYLE, P.C.**

By:

  
KEVIN H. MARINO